

KEVIN G. HORBATIUK (KGH-4977)
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Attorneys for Defendant
CUNNINGHAM DUCT WORK
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

.....X
IN RE LOWER MANHATTAN DISASTER SITE
LITIGATION

21 MC 102 (AW)

.....X
JACQUELINE PEREZ,

DOCKET NO.
07-CV-08284-AKH

Plaintiff,

-against-

100 CHURCH, LLC, ALAN KASMAN DBA KASCO,
AMBIENT GROUP, INC., ANN TAYLOR
STORES CORPORATION, BANKERS TRUST
COMPANY, BANKERS TRUST CORP.,
BATTERY PARK CITY AUTHORITY, BLACKMON-
MOORING STEAMATIC CATASTOPHE, INC.,
d/b/a ABMS CAT, BOARD OF EDUCATION OF THE
CITY OF NEW YORK, BROOKFIELD FINANCIAL
PROPERTIES, INC., BROOKFIELD FINANCIAL
PROPERTIES, L.P., BROOKFIELD PARTNERS, L.P.,
BROOKFIELD PROPERTIES CORPORATION,
BROOKFIELD PROPERTIES HOLDINGS, INC.,
BT PRIVATE CLIENTS CORP., CDL NEW YORK,
LLC., CUNNINGHAM DUCT CLEANING CO.,
DEPARTMENT OF BUSINESS SERVICES,
DEUTSCHE BANK TRUST COMPANY, DEUTSCHE
BANK TRUST COMPANY, DEUTSCHE BANK TRUST
COMPANY AMERICAS, DEUTSCHE BANK TRUST
CORPORATION, ENVIRONMENTAL CLEAN
AIR, INC., GPS ENVIRONMENTAL CONSULTANTS,
INC., HILLMAN ENVIRONMENTAL GROUP, LLC
INDOOR AIR PROFESSIONALS, INC.,
INDOOR ENVIRONMENTAL TECHNOLOGY, INC.,
JONES LANG LASALLE AMERICAS, INC.,
JONES LANG LASALLE SERVICES, CO., LAW
ENGINEERING, P.C., MERRILL LYNCH & CO., INC.,

**NOTICE OF ADOPTION
OF ANSWER TO MASTER
COMPLAINT**

NEW YORK CITY SCHOOL CONSTRUCTION
AUTHORITY, NOMURA HOLDING
AMERICA, INC., NOMURA SECURITIES
INTERNATIONAL, INC., ROYAL AND SUNALLIANCE
INSURANCE GROUP, PLC., STRUCTURE TONE (UK),
INC., STRUCTURE TONE GLOBAL SERVICES, INC.,
THE BANK OF NEW YORK TRUST COMPANY,
N.A., TISHMAN INTERIORS CORPORATION,
TOSCORP., INC., TRC ENGINEERS, INC., TRIBECA
LANDING LLC., TULLY CONSTRUCTION CO.,
INC., TULLY INDUSTRIES, INC., VERIZON NEW YORK,
INC., WESTON SOLUTIONS INC., WFP TOWER B
CO. G.P., CORP., WFP TOWER B HOLDING CO., L.P.,
WFP TOWER B CO., L.P., WFP TOWER D. CO., GP.
CORP., WFP TOWER D HOLDING CO., II L.P., WFP
TOWER HOLDING I. G.P., CORP., WFP TOWER D
CO., L.P., and ZAR REALTY MANAGEMENT
CORP., et al.

Defendants.

.....X
PLEASE TAKE NOTICE, that defendant CUNNINGHAM DUCT WORK
("CUNNINGHAM"), by its attorneys, RUSSO, KEANE & TONER, LLP, as and for its
Response to the allegations set forth in the Complaint by Adoption (Check-Off-Complaint)
Related to the Master Complaint filed in the above referenced action, hereby adopt their Answer
to Master Complaint dated, August 1, 2007, which was filed in the matter of *In Re World Trade
Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant, CUNNINGHAM DUCT CLEANING CO., INC.,
demands judgment dismissing the above captioned caption action as against it, together with its
costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
November 30, 2007

Respectfully submitted,
RUSSO, KEANE & TONER, LLP

By: s/ Kevin G. Horbatiuk
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CUNNINGHAM DUCT WORK
RKT File No.: 824.078

TO: CHRISTOPHER R. LoPALO, ESQ., (CL-6466)
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CERTIFICATION OF SERVICE

I hereby certify that on the 30th day of November, 2007, I electronically filed the foregoing NOTICE OF ADOPTION OF ANSWER BY DEFENDANT CUNNINGHAM DUCT CLEANING WORK with the Clerk of the Court using the CM/ECF System which sends notification of appearing parties.

RUSSO, KEANE & TONER, LLP

By: s/Kevin G. Horbatiuk

Kevin G. Horbatiuk (KGH-4977)

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RKT File # 820.078